



4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

ATTORNEYS

JUSTIN M. REILLY, ESQ.
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA
CATALINA ROMAN

Via: EDNY ECF

March 26, 2025

Honorable Judge Peggy Kuo, U.S.M.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Martinez, et al. v. Atlantis Super Wash Center, Inc., et al.*; 23-cv-04667 (CBA)(PK)

Dear Hon. Judge Kuo,

I represent Plaintiffs in this FLSA action. I write pursuant to Your Honor's Individual Rules to provide this Joint Status Letter and Request for an Extension of Time to Complete Discovery. The Parties have conferred regarding this request and defense counsel consents to its filing.

As the Court is aware, on February 18, 2025 the Court held a conference to address Plaintiffs' Motion to Compel discovery from Defendants. Your Honor directed Defendants to serve responses and documents no later than February 21, 2025. Upon receipt, Plaintiffs identified several deficiencies with Defendants' responses that the Parties are actively attempting to resolve without the need for judicial intervention. To that end, defense counsel and I met and conferred on February 27, 2025. While the discussion was productive, Plaintiffs are contemplating whether a further Motion to Compel is necessary.

More importantly, the meeting lead to a larger discussion regarding a potential resolution of this case. Over the past three (3) weeks, the Parties have had several meaningful settlement discussions, exchanging new demands and counteroffers, and are currently attempting to bridge the remaining gap of approximately \$40,000.00 without the need to allocate resources to continued litigation.

Given the ongoing settlement discussions, the Parties respectfully request a two-month extension of the discovery deadline, from March 28, 2025 until May 28, 2025, so that they can continue to engage in settlement discussions and, if unsuccessful, complete the remainder of discovery, which will include party depositions.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


Keith E. Williams, Esq.

cc: all counsel of record, via ECF.